

1 an "F", do you?

2 A. No, not at all.

3 Q. Can you turn back to -- this document  
4 does indicate the areas of disagreement that remain in  
5 various spots, doesn't it, between the SBC and the  
6 CLECs?

7 A. Are there footnotes? No, they are there.  
8 Yes.

9 Q. And in the text as well, right?

10 A. Right.

11 Q. For example, look at Page 37, the parties  
12 are in disagreement about the testing of the OSS  
13 interfaces, right? Do you see that sentence?

14 A. No, I don't. The parties -- oh, the  
15 parties are in disagreement?

16 Q. Yes.

17 A. The condition of the test, environment.  
18 No, you are right, it's open.

19 Q. This is the same Phase 1, Phase 2, Phase  
20 3 processes we discussed for the Advances Services  
21 POR; is that right?

22 A. Yes, it is.

1 Q. Am I correct that in this document SBC is  
2 reserving its right to ask the FCC for a waiver of the  
3 target dates for Phase 3?

4 A. The target date for submitting the Plan  
5 of Record?

6 Q. The target dates for Phase 3.

7 A. No, the target dates for Phase 3 are  
8 based on the close of Phase 2.

9 Q. On page 75 there is a section called  
10 "Reservation of Rights." Could you turn there,  
11 please?

12 A. I'm there.

13 Q. Do you have that?

14 A. Uh-huh.

15 Q. The next to the last sentence that that  
16 paragraph says, I am quoting, "SBC further reserves  
17 the right to ask the FCC for a waiver of target dates  
18 for Phase 3;" do you see that?

19 A. I see that.

20 Q. Now, come back to page 77 on that  
21 document, will you, please? Here is a little table.

22 A. Page 7?

1 Q. 77.

2 A. 77, I'm sorry. All right.

3 Q. And do you see the AIT entry next to the  
4 first four items there?

5 A. Yes.

6 Q. Do you see there is a difference of  
7 opinion between the CLECs and SBC concerning when the  
8 Graphical User Interface or GUI for pre-ordering or  
9 ordering should be made available?

10 A. That's true.

11 Q. And do you see the same discrepancy with  
12 respect to the application-to-application ordering  
13 interface?

14 A. Ordering interface, yes.

15 Q. You are proposing to make that available  
16 over a year from now on 9/22/01, right? 2001 you have  
17 to have interface for ordering?

18 A. We are not opting to make the interface  
19 available. EDI is already available in Ameritech. We  
20 are opting to make it uniform with the rest of the SBC  
21 regions, that is not providing it. The GUI, I will  
22 agree, is different and will be provided at a

1 different time.

2 Q. Well, isn't application-to-application  
3 interfaces different than EDI?

4 A. No, EDI is an application-to-application  
5 interface for ordering.

6 Q. Aren't there other  
7 application-to-application interfaces between EDI?

8 A. No, there is not, not for ordering.

9 Q. Not for ordering.

10 A. If you are referring to pre-ordering,  
11 it's EDI, CORBA and DataGate in California and in  
12 SWBT.

13 Q. Let me show you a two-page chart,  
14 Ms. Jacobson, entitled "Loop Quality Elements by  
15 Qualification Type for PB/NB and SWBT." And LSMFT --  
16 no. Does PB mean Pacific Bell?

17 A. Yes.

18 Q. NB is Nevada Bell?

19 A. Yes.

20 Q. SWBT is Southwestern Bell Telephone  
21 Company?

22 A. It is.

1 Q. You have seen this before, haven't you?

2 A. No.

3 Q. You have never seen this before?

4 A. No.

5 Q. Do you know whether a document like this  
6 exists for Ameritech?

7 A. No. I don't even know who wrote this  
8 document. Do you?

9 Q. Indeed I do, but I can't testify.

10 A. Are you saying that this is an SBC  
11 document?

12 Q. I am not allowed to testify,  
13 Ms. Jacobson. If I told you that this might have been  
14 passed out in line-sharing collaborative meetings,  
15 would that help you at all or not?

16 A. I didn't attend those meetings so, no, it  
17 wouldn't.

18 Q. You wouldn't know if that had been passed  
19 out then, right?

20 A. No.

21 Q. Am I right that whether you call it a  
22 back-office system as you do or an OSS system as I

1 might that LFACS is a relevant system with respect to  
2 line-sharing?

3 A. If you are asking for a new line-shared  
4 loop, then it would do an assignment on it.

5 Q. And isn't some of the information that  
6 you are saying is at CLEC's request on your list of  
7 bullets from LFACS from loop qual?

8 A. I'm sorry, I don't understand the  
9 question.

10 Q. Isn't some of the information in your  
11 testimony on those bullet data elements, isn't some of  
12 that from LFACS?

13 A. I don't know where the information is  
14 coming from.

15 Q. Can I ask you to just pull off the e-mail  
16 covering of that exhibit I handed you? It shouldn't  
17 be part of the exhibit. Now, do you have before you,  
18 Ms. Jacobson, do you have before you Ameritech's  
19 response to Covad Data Request 42?

20 A. I do.

21 MR. BOWEN: Your Honor, could you mark this,  
22 please -- let me describe it first. This is a

1 single-page cover response with an e-mail attached on  
2 the scope of work for software enhancements for SWITCH  
3 and SOAC, which I might call an OSS and the witness  
4 might call back-office systems, together with a work  
5 statement between Telcordia Technologies and SBC for  
6 license software enhancements for line-sharing  
7 solution. Both these documents are marked as  
8 confidential documents so I am not proposing that they  
9 be on the open record.

10 EXAMINER WOODS: This would be Rhythms/Covad  
11 Jacobson Proprietary Cross 5?

12 MR. BOWEN: Cross 5, yes.

13 (Whereupon Covad/Rhythms  
14 Jacobson Proprietary Cross  
15 Exhibit 5 was marked for  
16 purposes of identification as  
17 of this date.)

18 MR. BOWEN:

19 Q. All right. Ms. Jacobson, you have seen  
20 these before, I take it?

21 A. This particular contract?

22 Q. Yes.

1 A. No. I know of its existence.

2 Q. All right. Now, isn't this the scope of  
3 services that's supposed to support the OSS  
4 modifications that are going to be used to support  
5 line-sharing on a 13-state basis?

6 A. As I understand it, this was work that we  
7 needed Telcordia to do in order for us to comply. It  
8 isn't all the work that we had to do.

9 Q. I didn't mean to imply that. It is some  
10 of the work that you have to do to comply with your  
11 line-sharing obligations with OSS, right?

12 A. Uh-huh.

13 Q. Could you look back at the software  
14 services work statement, please, page 2? It's behind  
15 the green divider, it's the document just behind the  
16 green divider.

17 A. Okay, I am looking for green. I don't  
18 see green. Oh, there it is, okay.

19 Q. Page 2 of that document, do you have  
20 that?

21 A. Yes, I do.

22 Q. You see scope of services under Paragraph



1       1 on that page?

2               A.   Yes.

3               Q.   Now, am I correct that this statement of  
4       work is going to cover enhancements for line-sharing  
5       -- and these will all be all caps, acronyms, reporter  
6       warning. We are going to depth down three on the  
7       acronyms. SOAC, S-O-A-C, SWITCH, just like it sounds,  
8       LFACS, L-F-A-C-S, PAWS, P-A-W-S, NSDB, WFA/C, WFA/DI,  
9       WFA/DO, and LEIS/LEAD license software; do you see  
10      that?

11              A.   Yes, I do.

12              Q.   These are all from your earlier testimony  
13      what you would call back-office systems, right?

14              A.   The ones I recognize I would put in that  
15      classification.

16              Q.   Okay, fair enough. Which ones don't you  
17      recognize?

18              A.   Several. Never heard of PAWS. Not  
19      absolutely sure what NSDB is. And then LIES/LEAD I am  
20      not familiar with what it does either.

21              Q.   Somebody believes at SBC and somebody  
22      agrees at Telcordia that you have got to enhance all

1       these systems for the so-called line-sharing solution  
2       because it's in this contract, right?

3               A.   Can you show me where it says  
4       line-sharing? Point me to that?

5               Q.   Yeah, at the very top it says "License  
6       Software Enhancement for Line-sharing Solution" on the  
7       title of the document.

8               A.   Okay. Well, then I would say that  
9       someone believes this is -- these systems need to be  
10      enhanced.

11              Q.   Okay. Now, there is also a collaborative  
12      under way in Illinois on OSS issues, isn't there?

13              A.   Yes, there is.

14              Q.   And that's running separately from this  
15      13-state Plan of Record or Plans of Record, correct?

16              A.   Right.

17              Q.   And are you part of that process?

18              A.   Actually, someone who works for me has  
19      been attending those.

20              Q.   I take it that since you have testified  
21      in Illinois, though, you have kept yourself familiar  
22      with what's happening in the Illinois Plan of records?

1 A. Yes, I have.

2 Q. Let me show you another table. I have  
3 passed to you, Ms. Jacobson, a document entitled  
4 "Ameritech Illinois Wholesale Customer Service  
5 Meeting, June 16, 2000;" do you have that?

6 A. Yes.

7 Q. And it's a table of issued numbers, issue  
8 descriptions and the CLECs involved, is that right?

9 A. This is marked Proprietary.

10 Q. Fine.

11 A. I mean, is that --

12 Q. Where is it marked proprietary?

13 A. It says "Draft meeting notes for internal  
14 SBC use.

15 Q. Where is it marked for proprietary?

16 A. Well, it says for SBC use.

17 Q. Does it say anywhere on this document  
18 proprietary, Ms. Jacobson?

19 A. No.

20 Q. Do you recognize this document?

21 A. No, I don't.

22 Q. The person you had attending these

1 Ameritech Illinois OSS meetings has never showed this  
2 document to you before?

3 A. I don't believe that this is from those  
4 meetings. There wasn't a meeting on June 16, not in  
5 the collaboratives. They were supposed to be the 14th  
6 and 15th, and they were postponed.

7 Q. Are you testifying that there was not a  
8 meeting held on June 16 or scheduled for June 16 that  
9 was called the Wholesale Customer Service Meeting?

10 A. No, I'm not saying that. I am saying  
11 that that's not the title of the Illinois  
12 collaboratives, and there was not to my knowledge a  
13 meeting of the OSS collaboratives in Illinois on June  
14 16.

15 Q. Okay, that's fine. But do you know  
16 whether or not this meeting that's described here  
17 actually happened or not?

18 A. No, I don't know.

19 Q. Is there any kind of a tracking document  
20 that you are aware of that tracks the Illinois OSS  
21 collaborative meetings?

22 A. Yes, but I haven't seen it.

1 Q. How do you keep track of where you are in  
2 that process in Illinois; you meaning the group?

3 A. There is only -- there were meetings last  
4 week and again this week, and my employee went on  
5 vacation in between. So he sent me a voice mail, told  
6 me what's going on, and I also asked another party  
7 from regulatory how they were being handled. And so  
8 that's how I am keeping up at this point.

9 Q. Okay.

10 A. I plan to attend next week personally.

11 Q. You have been somewhat busy here, right?

12 A. Yes.

13 Q. I take it that -- I mean, I would expect  
14 you to stay informed but how is the group going to be  
15 tracking once it begins to track those things? How  
16 will the group be tracking the closed versus open  
17 issue; do you know?

18 A. I would imagine that they will do it on a  
19 matrix because that's normally the way they track  
20 issues.

21 Q. But that hasn't begun yet, is your  
22 testimony, to your knowledge?

1           A. I haven't seen it. I would believe it's  
2       been done.

3           Q. You would believe it has been done?

4           A. I would believe there is some document  
5       tracking the issues. We don't try to keep them in our  
6       head.

7           Q. From that answer I take it you will agree  
8       that that process has not reached completion; that is,  
9       you haven't gotten to the point where the CLECs and  
10      SBC and Ameritech Illinois agree on all the issues  
11      being addressed there; is that right?

12          A. We are not done with the meetings.

13          Q. That was my question.

14          A. Uh-huh.

15          Q. Okay.

16          A. Yes.

17          Q. Now, with respect to the Graphical User  
18      Interface issue or GUI, if I can use that term, you  
19      don't currently have an Ameritech Illinois loop  
20      qualification GUI available, do you?

21          A. Yes.

22          Q. Oh, you do. What do you call that?

1 A. TCNet.

2 Q. Now, the reference in your direct  
3 testimony on page 8, could you turn there with me,  
4 please? Actually at the bottom of page 7 I am going  
5 to read a sentence to you from your testimony quoting,  
6 "Although Ameritech Illinois does not currently  
7 provide a GUI, both the Advanced Services Enhanced POR  
8 and the Uniform and Enhanced OSS POR document the  
9 addition of GUIs to the Ameritech Illinois suite of  
10 OSS. For the Advanced Services POR in September of  
11 2000 Ameritech Illinois will make loop qualification  
12 available;" do you see that?

13 A. I do.

14 Q. I took that to mean that you didn't have  
15 a loop quad GUI yet; did I read that wrong?

16 A. No, you don't read it wrong. What I was  
17 intending to refer to is the Verigate GUI that  
18 Ameritech has asked for and the CLECs have asked to be  
19 deployed in the Ameritech territory. And my original  
20 knowledge of TCNet was not that it was a GUI, but I  
21 have been told since that it was.

22 Q. Since you wrote the testimony, you mean?

1           A. (Nodded in the affirmative.) And all the  
2 loop qualification information that's in the Plan of  
3 Record was put into TCNet as well as into EDI  
4 pre-ordering.

5           Q. And Verigate is going to be available  
6 March 24 of next year, is that right, under this  
7 proposal?

8           A. A web-based GUI will be available next  
9 March because we have to build an entire  
10 infrastructure for that in Ameritech that doesn't  
11 exist today.

12          Q. You are an employee, am I correct, of  
13 Pacific Bell?

14          A. Yes.

15          Q. Is there -- Verigate is available in  
16 Pacific, isn't it?

17          A. Yes, it is.

18          Q. Is Verigate available in the five SWBT  
19 states?

20          A. Yes, it is.

21          Q. Have you ever worked for Ameritech  
22 Illinois?



1 A. No.

2 Q. Have you ever worked for any Ameritech  
3 five-state regional state?

4 A. No.

5 Q. Okay. Now, bottom of page 8, top of page  
6 9, this is the so-called synchronization point about  
7 having the same data elements and the same format  
8 fields for pre-order versus order; do you see that?

9 A. Yes.

10 Q. And the top of page 9 you say you have  
11 agreed to make this possible pending the investigation  
12 of regional differences; do you see that?

13 A. Yes.

14 Q. Are there -- is the investigation  
15 complete?

16 A. No.

17 Q. Are there any regional differences in  
18 Illinois that you are aware of?

19 A. I'm not aware of them because it's not  
20 complete. We haven't set down with the results of our  
21 investigation.

22 Q. What's your committed date for this

1       synchronization today, if you know, if there is one?

2               A.   With the Uniform and Enhanced roll out of  
3       the platform, the EDI platform for all the regions, so  
4       that the schedule that's in the back of the Uniform  
5       and Enhanced Plan of Record will tell you when that  
6       uniform platform will be rolled out.

7               Q.   Now, I want to talk briefly about this  
8       issue of direct access versus filtered access versus  
9       mediated access. Do you understand Rhythms and Covad  
10      to be asking for, what you might want to call, read  
11      only access, meaning we can't change any data in what  
12      we might access?

13              A.   I understand that to be the case.

14              Q.   And once you call your back-office  
15      systems, if you have appropriate access, you can  
16      change those, the entries in those data bases, right?  
17      Not CLECs but Ameritech employees can change the  
18      entries in there?

19              A.   I wouldn't say that all systems are  
20      changed by representatives. I think some are changed  
21      by orders that drive the change. For instance, our  
22      billing system, when the order posts, it updates the

1        billing system. We don't type into the billing  
2        system. So we don't manipulate the information in  
3        there.

4                Q. That's a flow-through process you are  
5        describing, right?

6                A. No.

7                Q. Systems automatically update --

8                A. Any order that posts flow-through is just  
9        an order generation. So this is just driving a  
10       billing update, the order drives that.

11               Q. You understand that Rhythms when it says  
12       direct access is not asking for the ability to change  
13       any entries in any of your systems, don't you?

14               A. I believe that to be true.

15               Q. Would it be fair to call that kind of  
16       access, without the ability to change entries in  
17       there, mediated access? Is that a fair way to talk  
18       about that?

19               A. I don't believe it's mediated access.

20               Q. Well, if we had full access, we could  
21       change data, right?

22               A. It would depend on whether it's a system

1 that you can change data in.

2 Q. How about LFACS?

3 A. As I said before, I don't know how LFACS  
4 operates other than, if I am a service rep and I place  
5 an order, tomorrow I can look on that order and see  
6 what my cable and pair is assignment is. It came out  
7 of LFACS.

8 Q. I think you said you don't know whether  
9 or not employees can actually change the entries in  
10 there or not?

11 A. I would imagine they have the ability to  
12 update cable and pair information.

13 Q. Okay. And you understand that Rhythms is  
14 not asking for that ability?

15 A. That's right.

16 Q. In its request to access LFACS?

17 A. Yes.

18 EXAMINER WOODS: Where are we at, Mr. Bowen,  
19 because my time is up?

20 MR. BOWEN: Five-ish minutes.

21 Q. Now, am I right that SBC or  
22 SBC/Ameritech Illinois is still developing its OSS

1 processes for repairing and maintaining shared lines  
2 in a line-shared environment?

3 A. Developing our OSS --

4 Q. For repairing and maintaining shared  
5 lines in a line-sharing environment?

6 A. That's not my understanding. We are  
7 ready for line-sharing in the OSS.

8 Q. Let me show you a document -- I am  
9 showing the witness Ameritech's response to Covad Data  
10 Request 50. I will read the request first of all, ask  
11 you to read the answer for the record. The request  
12 was, "Please produce all documents that contain or  
13 refer to OSS for repairing and maintaining telephone  
14 lines across which Ameritech Advanced Data Services  
15 provisions data services and Ameritech Illinois  
16 provisions analog voice service. Such documents would  
17 include, but not be limited to, methods and procedures  
18 documents." Could you read the company response to  
19 that data request for the record?

20 A. "The process for repairing and  
21 maintaining shared lines is still under development.  
22 Therefore, there are no documents dealing with OSS for

1       repairing and maintaining shared lines."

2               Q.   Thank you.   Okay.   Now, I think you said  
3       before that the information on the list of 30 or so  
4       data elements comes from a variety of sources; is that  
5       right?

6               A.   Yes.

7               Q.   Not just LFACS, other systems, or data  
8       sources, right?

9               A.   Yes.

10              Q.   Let me show you the company's response to  
11       Rhythms Data Request 33 and, Your Honor, I am going to  
12       ask that you mark this as Jacobson Cross Exhibit 6,  
13       please.

14                               (Whereupon Covad/Rhythms  
15                               Jacobson Cross Exhibit 6 was  
16                               marked for purposes of  
17                               identification as of this  
18                               date.)

19              MR. BOWEN:

20              Q.   Do you have that, Ms. Jaconson?

21              A.   Yes, I do.

22              Q.   The question here was asking the company

1 to assume that you are going to build some new outside  
2 plant facilities and asking you to identify which data  
3 bases you would place certain kinds of data in; do you  
4 see that?

5 A. Yes.

6 Q. Now, if you look down at the response,  
7 there is a number of things we talked about already,  
8 there is LFACS, there are TIRKS; do you see the  
9 entries there for ARES, A-R-E-S?

10 A. Yes.

11 Q. And that would be where the company  
12 thinks it would put in information about the splice  
13 points, cable gauges, cable links and FDI or there  
14 appears to be some interface locations and types,  
15 right?

16 A. There and on paper.

17 Q. What is ARES?

18 A. I don't know really. I'm sorry, I don't  
19 know.

20 Q. You don't know? Do you know what it  
21 stands for?

22 A. No.

1 Q. Do you know if it's an OSS or a  
2 back-office system as you define those two terms  
3 differentially?

4 A. I would believe it to be a back-office  
5 system.

6 Q. Am I correct that Ameritech Illinois or  
7 Ameritech in general is refusing to accept manual  
8 orders for HFPL or line-sharing, and is insisting that  
9 the orders be placed on a mechanized LSR basis?

10 A. I have no knowledge of that.

11 Q. Have you ever heard of Brian Lowin?

12 A. Yes.

13 MR. BOWEN: Your Honor, I have insufficient  
14 number of copies of this one. I will get some for the  
15 reporter as soon as I can have more made.

16 THE WITNESS: You know what, I do not know what  
17 ARES is. Not because I looked at this, because I only  
18 looked at the first page. It's Access Request Entry  
19 System.

20 MR. BOWEN:

21 Q. And what does an ARES do; do you know?

22 A. It's an ordering system.



1 Q. Is that Ameritech specific?

2 A. Order entry system, yes, it is.

3 Q. You don't have that in Pacific land, do  
4 you?

5 A. No.

6 Q. Or SWBT?

7 A. No, we have SORD.

8 Q. It's like SORD; is the SORD analog?

9 A. It's the access side of the SORD.

10 Q. And SORD is Service Order and Retrieval  
11 Distribution, is that right, or if you were in Texas  
12 the SWBT, order and retrieval and information?

13 A. I take this back, this is our CESAR. You  
14 are confusing me. I'm sorry, this is our CESAR. This  
15 is for access requests.

16 Q. And access requests are different than  
17 local service requests, right?

18 A. Yes, they are.

19 Q. Access requests are how, if you are an  
20 interexchange carrier, you order interexchange  
21 connecting facilities, right?

22 A. Yes.

1 Q. So for local UNE-type things you use an  
2 LSR process or a Local Service Request process?

3 A. Right, right.

4 Q. Now, could you pick up with me the e-mail  
5 with a very large distribution list on it, and I  
6 scanned that, Ms. Jacobson, and I didn't see your name  
7 on here. So I am not surprised that you haven't seen  
8 it. I did see Ms. Schlackman on here and a few other  
9 people that will sound familiar from the witness list.

10 Your Honor, could you mark this -- I will  
11 just try -- it's an e-mail with a joint distribution  
12 list on the front and a two-sentence message -- as  
13 Jacobson Cross Number 7, please?

14 EXAMINER WOODS: Even though our names' not  
15 on it?

16 MR. BOWEN: Yes, even though it's not on  
17 there.

18 THE WITNESS: Even though I have never seen  
19 it?

20 MR. BOWEN: Yes, indeed.

21 (Whereupon Covad/Rhythms

22 Jacobson Cross Exhibit 7 was

1 marked for purposes of  
2 identification as of this  
3 date.)

4 MR. BOWEN:

5 Q. Ms. Jacobson, I am going to read this  
6 subject line here -- I'm sorry, read the subject and  
7 the message here from Brian Lowin. Subject: AIT,  
8 that's Ameritech, right?

9 A. Right.

10 Q. LSR, that's Local Service Request, right?

11 A. Yes.

12 Q. I am quoting now, "In today's CLEC/SBC  
13 line-sharing meeting I agreed to re-evaluate the  
14 decision that requires mechanized LSRs be submitted  
15 for HPFL orders in the Ameritech operating region. I  
16 have escalated and reconfirmed that Ameritech will not  
17 change its position that requires a mechanized LSR to  
18 be placed. Thanks, Brian." Did I read that  
19 correctly?

20 A. Yes.

21 Q. Now, this has to do with OSS, right?  
22 This is what we are talking about, how you place

1 orders, mechanized or manual?

2 A. I don't think this is referring to the  
3 difference between mechanized and manual. I think  
4 this is referring to the difference between an access  
5 request and a local request. If you are going to  
6 order HFPL, you need to order it on a local request,  
7 not on an access service request.

8 Q. Do you see any reference in the message  
9 to ASRs at all?

10 MR. ASHBY: Your Honor, I object.

11 THE WITNESS: A. No, I don't, but I also  
12 know we don't refuse manual orders.

13 MR. BOWEN:

14 Q. How is it that you are the OSS expert,  
15 and we are talking about Ameritech, and you are  
16 testifying on behalf of Ameritech Illinois, and you  
17 aren't even on this distribution list?

18 MR. ASHBY: Objection, argumentative, calls  
19 for speculation.

20 EXAMINER WOODS: I believe that is  
21 argumentative. I don't think that's a question she  
22 could ever answer, and I think it is argumentative.

1 MR. BOWEN:

2 Q. Ms. Jacobson, are you normally involved  
3 in the OSS that's specific to Ameritech Illinois?

4 A. Very often. But this particular one is a  
5 product decision. This isn't an OSS decision. It's  
6 available in the OSS to order a mechanized LSR. It's  
7 also available to order it manually. This is a  
8 decision on how you will order this product. And that  
9 decision is made by the product manager.

10 Q. Fair enough.

11 A. Not by me.

12 Q. Is Brian Lowin the product manager?

13 A. Yes, he is.

14 Q. And he works for SWBT; is that right?

15 A. That's right. But as you probably know,  
16 we all have 13-state responsibilities so we have to be  
17 somewhere.

18 Q. Okay. Well, let's talk about Illinois.  
19 This on its face, it looks to me like it says that for  
20 Illinois or for Ameritech's region of which Illinois  
21 is one state, Ameritech is requiring a mechanized LSR  
22 to order HFPL; isn't that what this says, this

1 document?

2 A. If you take those words out of context,  
3 yes. But I believe it's talking about the difference  
4 between acts. There is no reference to manual in  
5 here. So I would have to know the context in which he  
6 is making this remark.

7 MR. BOWEN: That's all I have, thank you.  
8 Your Honor, thank you for your patience and thank you,  
9 Ms. Jacobson, once again for your patience.

10 EXAMINER WOODS: We are going to go off the  
11 record at this time. As I informed everybody before,  
12 this is the dropdead band, so we are done for the day.  
13 We are back on July 6 at 1:30 p.m., okay.

14 MR. BOWEN: Could I move my exhibits? I  
15 forgot to do that, Your Honor.

16 EXAMINER WOODS: All right. We did have a  
17 number of exhibitS marked Cross Exhibits 1 through 7.  
18 I don't believe the Loop Qual Data Elements were ever  
19 marked.

20 MR. BOWEN: That's correct.

21 EXAMINER WOODS: And I don't believe that the  
22 Wholesale Customer Service Meeting document were

1 marked. So those have never been marked. We are  
2 moving Cross Exhibits 1 through 7, including  
3 Proprietary Number 5, into the record.

4 MR. ASHBY: We have no objection to 1 through  
5 6, Your Honor. Number 7, however, there is no  
6 foundation for it.

7 EXAMINER WOODS: I will agree with that.  
8 That document will not be admitted.

9 (Whereupon Covad/Rhythms  
10 Jacobson Cross Exhibits 1  
11 through 6 were admitted into  
12 evidenced.)

13 MR. DEANHARDT: Your Honor, there is one  
14 other thing of item. We had left the record open on  
15 identifying the splitter that Mr. Zulevic was shown  
16 earlier.

17 EXAMINER WOODS: Model number?

18 MR. DEANHARDT: Yes, Your Honor, and Mr. Van  
19 Deesen has handed me --

20 EXAMINER WOODS: Counsel for Ameritech?

21 MR. DEANHARDT: See, that's the reason I went  
22 with counsel for Ameritech the first time.

1                   He has provided me with a part number  
2                   and, if there is no objection from Ameritech, I will  
3                   state it for the record.

4                   EXAMINER WOODS: State it.

5                   MR. DEANHARDT: The part number is CO --

6                   MR. VAN BEBBER: It is COSSF96S2R007.

7                   EXAMINER WOODS: With that in, we are  
8                   continued to July 6, 2000, at 1:30 p.m. Thanks,  
9                   Sully.

10                                   (Whereupon the hearing in this  
11                                   matter was continued until  
12                                   July 6, 2000, at 1:30 p.m. in  
13                                   Springfield, Illinois.)

14

15

16

17

18

19

20

21

22



1 STATE OF ILLINOIS )  
 ) SS  
2 COUNTY OF SANGAMON )  
CASE NO.: 00-0312/0313  
3 TITLE: COVAD COMMUNICATIONS COMPANY  
RHYTHMS LINKS, INC.  
4

CERTIFICATE OF REPORTER

5 We, Cheryl Davis and Carla J. Boehl, do  
6 hereby certify that we are court reporters contracted  
7 by Sullivan Reporting Company of Chicago, Illinois;  
8 that we reported in shorthand the evidence taken and  
9 proceedings had on the hearing on the above-entitled  
10 case on the 30th day of June, 2000; that the foregoing  
11 pages are a true and correct transcript of our  
12 shorthand notes so taken as aforesaid and contain all  
13 of the proceedings directed by the Commission or other  
14 persons authorized by it to conduct the said hearing  
15 to be so stenographically reported.

16 Dated at Springfield, Illinois, on this 3rd  
17 day of June, A.D., 2000.

18  
19   
\_\_\_\_\_

20 Certified Shorthand Reporter  
21  
22